

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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G&A STRATEGIC INVESTMENTS I LLC, et al.,

Plaintiffs,

v.

PETRÓLEOS DE VENEZUELA, S.A. et al.,

Defendants.

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: Case No. 1:23-cv-10766-JSR

: (Consolidated with Case No. 1:23-  
: cv-10772-JSR and Case No. 1:24-  
: cv-04448-JSR)

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GIRARD STREET INVESTMENT HOLDINGS  
LLC,

Plaintiff,

v.

PETRÓLEOS DE VENEZUELA, S.A. et al.,

Defendants.

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: Case No. 1:23-cv-10772-JSR

: (Consolidated with Case No. 1:23-  
: cv-10766-JSR and Case No. 1:24-  
: cv-04448-JSR)

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GIRARD STREET INVESTMENT HOLDINGS  
LLC,

Plaintiff,

v.

PDV HOLDING, INC.,

Defendant.

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: Case No. 1:24-cv-4448-JSR

: (Consolidated with Case No. 1:23-  
: cv-10766-JSR and Case No. 1:23-  
: cv-10772-JSR)

**STIPULATION REGARDING ADMISSIBILITY OF EVIDENCE**

WHEREAS, Plaintiffs Girard Street Investment Holdings LLC, and G&A Strategic Investments I – VII LLC (collectively, the “Plaintiffs”) and Petróleos De Venezuela, S.A., PDVSA Petróleo S.A., and PDV Holding, Inc. (collectively, the “Defendants”, and with

Plaintiffs, the “Parties”) have recently discussed various methods to streamline the process of admitting evidence in this case, including at trial; and

WHEREAS, as a result of those discussions, the Parties have reached agreement relating to the admissibility of several categories of documents;

NOW, WHEREFORE, IT IS HEREBY STIPULATED and AGREED by the Parties as follows:

1. The authenticity of any document produced by any of the Plaintiffs in these Actions shall not be contested by any Plaintiff. The authenticity of any document produced by any of the Defendants in these Actions shall not be contested by any Defendant. The authenticity of any document produced by any third party in these Actions shall not be contested by that third party.

2. The following categories of documents produced on or before February 24, 2025 in discovery in these Actions shall be considered to meet the business records exception to the hearsay rule as set forth in Fed. R. Evid. 803(6)): (i) SEC filings, (ii) board meeting minutes, (iii) written consents, (iv) accounting documents, (v) investment documents, (vi) documents of formation, and (vii) issues of Gaceta Legislativa .

3. As used in Paragraph 2, above,

(i) “SEC filings” shall mean filings submitted to the U.S. Securities and Exchange Commission, including attachments, by or on behalf of Petróleos de Venezuela, S.A. (“PDVSA”), PDVSA Petróleo S.A. (“Petroleo”), PDV Holding, Inc. (“PDVH”), Gramercy Funds Management LLC, Girard Street Investment Holdings LLC, or G&A Strategic Investments I – VII LLC from January 1, 2019, onward;

(ii) “board meeting minutes” shall mean all final meeting minutes, excluding attachments thereto, of the PDVSA Ad Hoc Board, the Petroleo Board, the PDVH Board, and any board or board-equivalent body (such as a management committee) of Gramercy Funds Management LLC, Girard Street Investment Holdings LLC, or G&A Strategic Investments I – VII LLC from January 1, 2019, onward;

(iii) “written consents” shall mean all final unanimous written consents, excluding attachments thereto, of the PDVSA Ad Hoc Board, the Petroleo Board, the PDVH Board, or the stockholders of PDVSA or PDVH from January 1, 2019, onward;

(iv) “accounting documents” shall mean (A) accounting records, spreadsheets, and other accounting documents of PDVSA, Petroleo, PDVH, Gramercy Funds Management LLC, Girard Street Investment Holdings LLC, or G&A Strategic Investments I – VII LLC from January 1, 2019, onward, including general ledgers, sub-ledgers, accounts payable and accounts receivable registers, journal entries, trial balances, income statements, balance sheets, cash flow statements, and any other reports of the data in such entities’ accounting systems (excluding any reports created for purposes of this litigation); and (B) all final financial statements and corresponding auditors’ reports for PDVSA, Petroleo, PDVH, Gramercy Funds Management LLC, Girard Street Investment Holdings LLC, or G&A Strategic Investments I – VII LLC from January 1, 2019, onward;

(v) “investment documents” shall mean final documents referencing the Series 2016E and 2017D notes at issue in these Actions where such documents were created by or on behalf of Gramercy Funds Management LLC, Girard Street Investment Holdings LLC, or G&A Strategic Investments I – VII LLC. “Investment documents” are limited to

investor presentations, term sheets, Loan Market Association trade confirmations, and due diligence questionnaires;

(vi) “documents of formation” shall mean all official bylaws and articles of incorporation of PDVSA, Petroleo, PDVH, Gramercy Funds Management LLC, Girard Street Investment Holdings LLC, or G&A Strategic Investments I – VII LLC from January 1, 2019 onward; and

(vii) “issues of Gaceta Legislativa” means issues of Gaceta Legislativa Asamblea Nacional de la Republica Bolivariana de Venezuela from January 1, 2019 onward.

4. This Stipulation shall not apply to documents referenced, relied upon, or cited by any expert witness, except to the extent such document was produced by a party. Nothing in this Stipulation shall be interpreted to suggest that any particular documents or evidence are, or are not, relevant to the Actions. Nothing in this Stipulation shall be interpreted to suggest that any particular documents or evidence should, or should not be, produced in discovery in the Actions. Nothing in this Stipulation shall be interpreted to suggest that any entity is, or is not, the alter-ego of any other entity.

/s/ Michael J. Baratz

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*Attorneys for Defendant PDV Holding, Inc.*

SO ORDERED:

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Hon. Jed S. Rakoff

**CERTIFICATE OF SERVICE**

This is to certify that I have this February 6, 2025 caused copies of the foregoing  
Stipulation Regarding Admissibility of Evidence to be sent to counsel for all parties via email.

/s/ Michael J. Baratz  
Michael J. Baratz